

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

UNITED STATES DISTRICT COURT

for the
Las Vegas District of Nevada

D

2:20-cv-01203-GMN-VCF

Amiee O'Neil

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

New York State
for Suny Oswego

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

for John Mazzoli

Jury Trial: (check one) ☐ Yes ☒ No

FILED	RECEIVED
ENTERED	SERVED ON
COUNSEL/PARTIES OF RECORD	
JUN 24 2020	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY:	DEPUTY

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS
(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Address

County

Telephone Number

E-Mail Address

Saimee O. Neil
 844 N. Rainbow
 Las Vegas NV
 Clark
 702-302-0481
 whereintheworldisaimee
 @gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

State of NY
 Attorney General
 The Capitol
 Albany NY 12224

☐ Individual capacity
 ☐ Official capacity

Defendant No. 2

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

☐ Individual capacity
 ☐ Official capacity

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

Defendant No. 3

Name _____

Job or Title (if known) _____

Address _____

City _____

State _____

Zip Code _____

County _____

Telephone Number _____

E-Mail Address (if known) _____

☐

Individual capacity

☐

Official capacity

Defendant No. 4

Name _____

Job or Title (if known) _____

Address _____

City _____

State _____

Zip Code _____

County _____

Telephone Number _____

E-Mail Address (if known) _____

☐

Individual capacity

☐

Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐Federal officials (a *Bivens* claim)☒

State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

Discrimination
and Equal Protection

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

John Mazzoli, a former resident of Oswego NY brother was the former Vice President at SUNY Oswego and NYS is targeting me over him

- B. What date and approximate time did the events giving rise to your claim(s) occur?

This began in 2004 with non stop harassment precipitated by the Mazzolis using New York State against me

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

John Mazzoli, now deceased, hates me, wanted revenge and has been interfering with my life by using unequal Power and privilege to do so.

1. C. The Mazzoli's are using New York State to have men approach me and are preinformed with a prejudice.

This is interfering with my relationship with my boyfriend because the Mazzoli's are having men target me. They are interfering with my right to fertility as I need to be pregnant for a complete blood transfusion.

2.
C.

The Mazzoli's are influencing everyone around me to intentionally interfere with my livelihood.

They are intentionally having men intimidate me and sexually harass me when I have a boyfriend.

New York State is violating equal Protection of the 14th Amendment to the US Constitution

3. C.

The state is Supposed to guarantee me the same rights, privileges, and protection as everyone else.

This is being Done out of Hate and Revenge against me.

This is a prejudice motivated crime perpetrated against me out of Hate and Corruption in New York

State. New York State
by the use of prejudice
governing authority
is engaging in a
Hate Crime as they
are unlawfully targeting
me as a hate Crime
by having me harassed,
followed, interfered
with and its all
being Conspired by
Gloria Mazzoli out
of Hate and revenge.

The Equal Protection Clause requires states to treat their citizens equally and I am alleging that New York State is deliberately discriminating against me and interfering with my life intentionally and has been using this prejudice against me as a favor to John Mazzoli.

They are interfering with my livelihood, my relationships and my health by intentionally

b.

Having me targeted out of
Hate. I am demanding that
New York State, a State
and government entity
following me around the
country intentionally
having men sexually harass.

There is no reason for
this to continue. The State
is deliberately and
intentionally discriminating
against me.

The 14th Amendment
guarantees equal protection
under the colors of State

7.

laws. I am being targeted
and harassed by men
brought on by the Mazzoli's.

I bring this complaint
under 18 USC 1983
under colors of the
law.

Aimee O. Neil
Aimee O. Neil
June 17, 2020

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Mental Anguish

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Punitive \$5,000,000
Compensatory \$5,000,000
Injunctive Relief \$5,000,000

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: June 18, 20

Signature of Plaintiff

Printed Name of Plaintiff

Aimee O'Neil
Aimee O'Neil

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address

Leigh F. Hunt
Security Services
200 Summit Avenue, Syracuse
New York 13207

leighfhunt@AOL.Com

(315) 263-5044

To whom it may concern in the Matter of Amiee O'Neil v. various parties

I am a licensed Private Investigator licensed by the State of New York and have been retained on various occasions by Ms. Aimee O'Neil since the beginning of 2004

During the last eighteen months Ms. O'Neil has reported to me that she is being continually harassed, followed, spied upon, her numerous phones being tapped and numerous other harassment tactics. She has reported that on several occasions, men unknown to her have come up to her tried to engage her in conversations indicating that they knew all about her and made comments that frightened and alarmed her.

At one point early on in one of the previous investigations on behalf of Ms. O'Neil and in conversation with Mr. John Mazzoli he related to me the bad blood between his ex-wife Dawn that his ex-wife told him she would follow Ms. O'Neil forever.

During the time that Ms. O'Neil was in Colorado I maintained constant contact with her by phone and text messages. Ms. O'Neil was concerned that people she had known for an exceptionally long time were now acting different toward her. I advised her that often it was because other individuals had made comments about her and unfortunately, they were believed and influenced.

I made several attempts to locate and interview John Mazzoli with negative results. I was however able to interview John Mazzoli's father who stated that he knew nothing about Amiee O'Neil and had not seen or heard from her since before she left New York State. At the time that I spoke with Mr. Mazzoli I tried to speak with his wife Gloria Mazzoli however she refused to speak with me and asked me to leave the property which I did.

In furtherance of this investigation and in an attempt to get the reported harassment of Ms. O'Neil to cease and desist I contacted her mother by phone which consisted of a very short conversation in which she stated she had no interest in her daughter Amiee whatsoever and didn't even know where she was living at that time, however it had been reported that Aimee's Mother had a young woman threaten to kill Amiee out of hate and jealousy, verified by Ms. O'Neil. Most recently I again attempted to contact Aimee's mother by phone with

negative results. Ms. O'Neil is fortunate to have enlisted the aid of her aunt who has reportedly connections in government through which she is working on getting information for her niece Amiee.

John Mazzoli has been a person of interest as Mr. Mazzoli and Ms. O'Neil were close friends at one time and Ms. O'Neil believes that with the aid of his mother Gloria Mazzoli, he is influencing individuals to keep track of and harass her.

Of utmost importance currently is the belief by Ms. O'Neil that somewhere on her person is a microchip or some other type of sophisticated device allowing for the monitoring of not only her location but also possibly monitoring her conversations.

I have strongly advised Ms. O'Neil to get this thoroughly checked out as soon as possible keeping in mind current conditions.

Most recently Ms. O'Neil has advised me that remembering her time in New York State and the fact that Mr. Mazzoli had reportedly obtained many jobs for individuals with Alcan Aluminum Company that there is a possibility, according to Ms. O'Neil, that this company might be assisting Mr. John Mazzoli .

Leigh F. Hunt